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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13 v.  
STEPHEN MOORE,  
14 Defendant.

Case No. 2:23-mj-00013-BNW

**JOINT STATUS REPORT AND  
STIPULATION TO CLOSE CASE**

15  
16 IT IS HEREBY STIPULATED AND AGREED, by and between  
17 Jason M. Frierson, United States Attorney, and Skyler Pearson, Assistant United  
18 States Attorney, counsel for the United States of America, and Rene L. Valladares,  
19 Federal Public Defender, and Keisha K. Matthews, Assistant Federal Public  
20 Defender, counsel for Stephen Moore, that the remaining term of unsupervised  
21 probation be terminated, and the above-captioned matter be closed.

22 This Stipulation is entered into for the following reasons:

23 1. On August 2, 2023, Mr. Moore entered into a Petty Offense Plea  
24 Agreement with the United States in which he agreed to plead guilty to Count One  
25 of the Complaint, Operating a Motor Vehicle while Under the Influence of Drugs  
26

1 (marijuana) in violation of 36 C.F.R. § 4.23(a)(1), a Class B misdemeanor. ECF No.  
2 14.<sup>1</sup>

3 2. The parties agreed to recommend that Mr. Moore be sentenced to one  
4 year of unsupervised probation with the following special conditions: (i) pay a \$500  
5 fine and a mandatory \$10 penalty assessment; (ii) attend and complete the Lower  
6 Court Counseling's DUI course and Victim Impact Panel; (iii) complete an 8-hour  
7 online drug and alcohol course; (iv) stay out of the Lake Mead National Recreation  
8 Area for a period of 6 months and (v) not violate any local, state, or federal laws for  
9 a period of six months.

10 3. On August 2, 2023, this Court sentenced Mr. Moore pursuant to the  
11 parties' plea agreement.

12 4. Since commencing his term of unsupervised probation, Mr. Moore has  
13 successfully completed conditions (i), (ii), (iii), (iv), and (v).

14 5. The parties agree to jointly move to allow Mr. Moore to withdraw his  
15 plea of guilty to Count 1, Operating a Motor Vehicle while Under the Influence of  
16 Drugs (marijuana) in violation of 36 C.F.R. § 4.23(a)(1).

17 6. The government hereby moves, pursuant to the plea agreement to  
18 amend Count 1 of the Complaint to a charge of Reckless Driving, a violation of Title 36  
19 C.F.R. § 4.2(b) and NRS 484B.653.

20 7. Mr. Moore hereby pleads guilty to the amended Count 1 of the  
21 Complaint.

22 8. The parties jointly request that the original sentence be applied to the  
23 Reckless Driving conviction.

24  
25 \_\_\_\_\_  
26 <sup>1</sup> The Plea Agreement does not appear on the docket. ECF No. 14 is the minute order  
detailing the terms of the plea agreement.

1           9.       Considering Mr. Moore has successfully completed all terms and  
2 conditions of his sentence, the parties jointly request that the above-captioned  
3 matter be closed.

4  
5           DATED this 2nd day of August 2024.

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7           RENE L. VALLADARES  
8           Federal Public Defender

          JASON M. FRIERSON  
          United States Attorney

9           */s/ Keisha K. Matthews*  
10          By \_\_\_\_\_  
11          KEISHA K. MATTHEWS  
          Assistant Federal Public Defender

*/s/ Skyler Pearson*  
          By \_\_\_\_\_  
          Skyler Pearson  
          Assistant United States Attorney

1                                   **UNITED STATES DISTRICT COURT**  
2                                   **DISTRICT OF NEVADA**

3           UNITED STATES OF AMERICA,  
4                                   Plaintiff,

5                                   v.

6           STEPHEN MOORE,  
7                                   Defendant.  
8

Case No. 2:22-mj-00013-BNW  
**ORDER**

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10           Based on the pending Stipulation of counsel, and good cause appearing  
11 therefore, the Court finds that:

12           1.     Mr. Moore has successfully completed all terms and conditions of his  
13 sentence.

14                                   **ORDER**

15           IT IS HEREBY ORDERED that Mr. Moore's request to withdraw his guilty  
16 plea to Operating a Motor Vehicle while Under the Influence of Drugs (marijuana)  
17 is GRANTED.

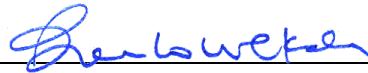
18           IT IS FURTHER ORDERED that the government's request to amend Count  
19 One of the Complaint to a charge of Reckless Driving, a violation of 36 CFR § 4.2  
20 and NRS 484B.653, a misdemeanor, is GRANTED.

21           IT IS FURTHER ORDERED that the Court accepts Mr. Moore's guilty plea  
22 to the amended Count 1 of the Complaint – Reckless Driving, a violation of 36 CFR  
23 § 4.2 and NRS 484B.653, a misdemeanor.

24           IT IS FURTHER ORDERED that the original sentence be applied to the  
25 amended Count 1 of the Complaint.  
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1 IT IS FURTHER ORDERED that because Mr. Moore has completed all  
2 terms and conditions of his sentence, that this case is closed.

3 DATED this 5 day of August 2024.

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6 UNITED STATES MAGISTRATE JUDGE  
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